

DECLARATION OF ALI RABBANI

CAMPBELL & WILLIAMS

J. COLBY WILLIAMS (Nev. Bar No. 5549)

jcw@cwlawlv.com

710 South 7th Street

Las Vegas, Nevada 89101

Telephone: (702) 382-5222

Facsimile: (702) 382-0540

PAUL HASTINGS LLP

SUSAN LEADER (*admitted pro hac vice*)

susanleader@paulhastings.com

ALI R. RABBANI (*admitted pro hac vice*)

alirabbani@paulhastings.com

STEPHANIE BALITZER (*admitted pro hac vice*)

stephaniebalitzer@paulhastings.com

PAUL HASTINGS LLP

1999 Avenue of the Stars

Los Angeles, California 90067

Telephone: (310) 620-5700

Facsimile: (310) 620-5899

Attorneys for Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

EVERETT BLOOM, JACK GRAHAM,
and DAVE LINDHOLM, on behalf of
themselves, and those similarly situated,

Plaintiffs,

vs.

ZUFFA, LLC, ENDEAVOR
STREAMING, LLC, and ENDEAVOR
GROUP HOLDINGS, INC.,

Defendants.

CASE NO. 2:22-cv-00412-RFB-BNW

**DECLARATION OF ALI R. RABBANI
IN SUPPORT OF DEFENDANT
ZUFFA, LLC'S SUR-REPLY IN
OPPOSITION TO PLAINTIFFS'
MOTION FOR CLASS
CERTIFICATION**

1 I, Ali R. Rabbani, declare as follows:

2 1. I am an attorney with Paul Hastings LLP, counsel of record for Defendant Zuffa,
3 LLC (“Zuffa”). This declaration is submitted in support of Zuffa’s Sur-Reply in Support of
4 Opposition to Motion for Class Certification. I have personal knowledge of the facts set forth
5 herein and, if called as a witness, I could and would testify competently to them.

6 2. Attached hereto as **Exhibit 1** is a true and correct copy of Zuffa’s Sur-Reply in
7 Opposition to Plaintiffs’ Motion for Class Certification.

8 3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts of the
9 Deposition of Tobias Wooldridge, dated January 25, 2024, which have been designated Highly
10 Confidential under the Stipulated Protective Order in this case.

11 4. Attached hereto as **Exhibit 3** is a true and correct copy of the Supplemental Expert
12 Report of Ron Schnell, dated February 9, 2024.

13 I declare under penalty of perjury under the laws of the United States of America that the
14 foregoing is true and correct.

15 Executed this 9th day of February at Newport Beach, California.

16
17 /s/ Ali R. Rabbani

18 ALI R. RABBANI
19
20
21
22
23
24
25
26
27
28

Bloom, et al. v. Zuffa, LLC, et al.
USDC of Nevada | Case No. 2:22-cv-00412-RFB-BNW

Index

Exhibit	Description	Page
	Declaration of Ali Rabbani in Support of Defendant Zuffa, LLC's Sur-Reply in Opposition to Plaintiffs' Motion for Class Certification	
Exhibit 1	Zuffa's Sur-Reply in Opposition to Plaintiffs' Motion for Class Certification	1-5
Exhibit 2	Excerpts of the Deposition of Tobias Wooldridge, dated January 25, 2024	6-29
Exhibit 3	Supplemental Expert Report of Ron Schnell, dated February 9, 2024	30-36